

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket No. 1332

**CERTIFICATE OF NO OBJECTION TO DEBTORS’
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF O’MELVENY & MYERS LLP
AS SPECIAL COUNSEL TO THE RESTRUCTURING COMMITTEE OF THE
BOARD OF DIRECTORS OF THE DEBTORS, EFFECTIVE AS OF MARCH 18, 2021**

1. On May 4, 2021, Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of O’Melveny & Myers LLP as Special Counsel to the Restructuring Committee of the Board of Directors of the Debtors, Effective as of March 18, 2021* (Docket No. 1332) (the “**Application**”). Objections to the Application were required to be filed and served by May 18, 2021 (the “**Objection Deadline**”).

2. Prior to the expiration of the Objection Deadline, the Debtors received comments from the U.S. Trustee to the Application. Specifically, the U.S. Trustee requested the addition of certain language to the proposed order attached to the Application (the “**Original**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Proposed Order”). A revised version of the proposed order accepting and incorporating the U.S. Trustee’s comments is attached hereto as **Exhibit A** (the “**Revised Proposed Order**”).

3. In accordance with paragraph 41 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than 24 hours have passed since the Objection Deadline, (ii) the undersigned counsel is unaware of any objections to the Application, and (iii) the undersigned counsel has reviewed the Court’s docket and no objection or response to the Application appears thereon.

4. Therefore, the Debtors respectfully request entry of the Revised Proposed Order attached hereto as **Exhibit A**. A blackline of the Revised Proposed Order marked against the Original Proposed Order filed with the Application is attached hereto as **Exhibit B**.

Dated: June 1, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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-and-

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Attorneys for Debtors

and Debtors in Possession

Certificate of Service

I hereby certify that on June 1, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez